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9 Attorneys for Plaintiff

10 PERDANA CAPITAL (LABUAN) INC.

11 A Malaysian Corporation

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 PERDANA CAPITAL (LABUAN) INC., a ) Case No.: CV-09-1479 PJH  
15 Malaysian corporation, ) Assigned to Hon. Phyllis J. Hamilton  
16 Plaintiff, )  
17 vs. )  
18 MOHAMMAD AKRAM CHOWDRY, an ) **STIPULATION TO CONTINUE JULY  
19 individual; HI-TECH VENTURE ) 16, 2009 INITIAL CASE  
PARTNERS, LLC, a Delaware Limited ) MANAGEMENT CONFERENCE AND  
Liability Company; HI-TECH ASSOCIATES, ) RELATED DATES  
a California Limited Liability Company; and )  
DOES 1-50, ) Date: September 10, 2009  
Defendants. ) Time: 2:30 p.m.  
Dept.: Courtroom 3, 17th Floor**

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21  
22 WHEREAS, there is currently an Initial Case Management Conference scheduled for  
23 July 16, 2009 pursuant to the Court's Order Setting Initial Case Management Conference and  
24 ADR Deadlines;

25 WHEREAS, the hearing on Defendants' Motion to Dismiss is scheduled for July 29,  
26 2009, at 9:00 a.m. in Courtroom 5 of the Northern District;

1       **WHEREAS**, pursuant to Local Rule 16-2(d), a party may seek relief from the Case  
2 Management Schedule upon a motion that (1) describes the circumstances which support the  
3 request; (2) affirms that counsel for the moving party has conferred with all other counsel in an  
4 effort to reach agreement about the matter and reports whether the other counsel supports or  
5 opposes the request for relief; (3) is accompanied by a proposed revised case management  
6 schedule; and (4) indicates any changes required in the ADR process or schedule in the case;

7       **WHEREAS**, the parties agree that good cause exists to reschedule the Initial CMC and  
8 the associated Case Schedule until such time that the Court has heard and ruled on Defendants'  
9 Motion to Dismiss and the parties have an opportunity to act in accordance with such ruling;

10      **WHEREAS**, the parties agree that compliance with Rule 26(f), the completion of initial  
11 disclosures, and decisions regarding the ADR process should not be conducted until the  
12 pleadings are set and the case is at issue;

13      **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by the  
14 undersigned parties as follows:

15      1.       The hearing date for the Initial Case Management Conference shall be scheduled  
16 for **Thursday, September 10, 2009**, at 2:30 p.m., in Courtroom 3, 17th Floor of the Northern  
17 District;

18      2.       The last day for parties to (a) meet and confer re: initial disclosures, early  
19 settlement, ADR process selection, and discovery plan; (b) file ADR Certification signed by  
20 Parties and Counsel; and (c) file either Stipulation to ADR Process or Notice of Need for ADR  
21 Phone Conference shall be **Thursday, August 20, 2009**;

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3. The last day for parties to file the Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per the Court's Standing Order re Contents of Joint Case Management Statement shall be **Thursday, September 3, 2009**.

## **IT IS SO STIPULATED.**

Respectfully submitted,

DATED: June 24, 2009

KAUFMAN DOLOWICH VOLUCK & GONZO LLP

By: /s/ Joseph Kouri  
Joseph Kouri  
Attorneys for Plaintiff  
PERDANA CAPITAL (I)  
A Malaysian Corporation

Respectfully submitted,

DATED: June 24, 2009

LAW OFFICES OF MICHAEL Q. EAGAN

By: /s/ Michael Q. Eagan  
Michael Q. Eagan  
Attorneys for Defendants  
MOHAMMAD AKRAM  
VENTURE PARTNERS,  
ASSOCIATES

I, Joseph Kouri, am the ECF User whose ID and password are being used to file this ADR Certification by Parties and Counsel. In compliance with General Order 45, X.B., I hereby attest that Michael Q. Eagan has concurred in this filing.

DATED: June 24, 2009

By: /s/ Joseph Kouri

Joseph Kouri (State Bar No. 133804)  
jkouri@kdvglaw.com

1 PURSUANT TO STIPULATION, IT IS SO ORDERED  
2

3 DATED: June 25, 2009  
4

5 By: \_\_\_\_\_  
6 The Honorable \_\_\_\_\_  
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